UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

In re: Bair Hugger Forced Air Warming Devices Products Liability Litigation

MDL No. 15-2666 (JNE/DTS)

This Document Relates to: ALL CASES

DEFENDANTS' SECOND RULE 37 MOTION TO BAR PLAINTIFFS' GENERAL CAUSATION EXPERT OPINIONS

Pursuant to Federal Rules of Civil Procedure 16 and 37, Defendants 3M Company and Arizant Healthcare Inc. (together, "Defendants") move this Court for an order (i) barring Plaintiffs from using the improper reports or opinions of Nathan Bushnell and Yadin David in any motion, hearing, or trial in the MDL, and (ii) awarding Defendants their costs and fees incurred in connection with this motion. This motion is based upon the accompanying Memorandum in support of the Motion, the Declaration of Benjamin W. Hulse, as well as the files, records, and proceedings herein.

Dated: February 1, 2019

Respectfully submitted,

s/Benjamin W. Hulse

Jerry W. Blackwell (MN #186867) Benjamin W. Hulse (MN #0390952) Mary S. Young (MN #0392781) BLACKWELL BURKE P.A. 431 South Seventh Street, Suite 2500

Minneapolis, MN 55415 Phone: (612) 343-3200 Fax: (612) 343-3205

Email: blackwell@blackwellburke.com bhulse@blackwellburke.com myoung@blackwellburke.com

Bridget M. Ahmann (MN #016611x) FAEGRE BAKER DANIELS LLP 2200 Wells Fargo Center 90 South Seventh Street Minneapolis, MN 55402 Phone: (612) 766-7000 Email: bridget.ahmann@faegrebd.com

Lyn Peeples Pruitt
MITCHELL WILLIAMS SELIG
GATES & WOODYARD
425 West Capitol Avenue, Suite 1800
Little Rock, AR 72201-3525
Phone: (501) 688-8869
Fax: (501) 688-8807

Email: lpruitt@mwlaw.com

Counsel for Defendants 3M Company and Arizant Healthcare Inc.